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October 5, 2005

**VIA FACSIMILE AT 202/452-3819**

Ms. Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Ave., NW  
Washington, DC 20551

**RE: Regulation E ATM Disclosures**  
Docket No. R-1234

Dear Ms. Johnson:

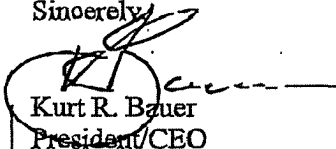
The Wisconsin Bankers Association (WBA) is the largest financial institution trade association in Wisconsin, representing 310 state and nationally chartered banks, savings and loan associations, and savings banks located in communities throughout the state. WBA supports the efforts of the Federal Reserve Board (Board), to amend ATM disclosure language and appreciates the opportunity to comment on the proposed amendment to Regulation E and the staff commentary. WBA agrees with the Board's proposal to allow ATM operators to provide an alternative disclosure that a fee *may* be imposed to avoid potential customer confusion.

Many Wisconsin banks offer to its customers account products and services which allow for free ATM usage regardless of ATM operator ownership. Other financial institutions have partnered together in an agreement not to service charge each other's ATM customers. It is because of products and services such as these that an ATM notice indicating that a fee *will* be imposed is not the most accurate description of the transaction. Whereby an ATM notice indicating that a fee *may* be imposed is a more clear and accurate reflection of such transactions.

To require a bank to post a notice stating that an ATM fee *will* be imposed when in fact the transaction would be free, will confuse and mislead the bank's customers. Rather, by disclosing that an ATM fee *may* be imposed, the financial institution would now be allowed to more accurately disclose its actual practice.

Once again, the WBA appreciates the opportunity to submit comments on the proposed amendments to Regulation E and the staff commentary. WBA encourages the Board to promptly finalize the proposed rule as drafted.

Sincerely,

  
Kurt R. Bauer  
President/CEO

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